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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Implement)	
Senate Bill No. 1488 (2004 Cal. Stats., Ch. 690)	Rulemaking 05-06-040
(Sept. 22, 2004)) Relating to Confidentiality of)	
Information)	(Filed June 30, 2005)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) PHASE II COMMENTS
REGARDING CONFIDENTIALITY FILING REQUIREMENTS

FRANK J. COOLEY
BETH A. FOX
WILLIAM V. WALSH

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-4531
Facsimile: (626) 302-1935
E-mail: William.V.Walsh@SCE.com

Dated: **August 4, 2006**

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STATE OF CALIFORNIA**

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Pursuant to Ordering Paragraph No. 13 of Decision (“D.”) 06-06-066, mailed by the California Public Utilities Commission (“Commission”) on July 5, 2006, Southern California Edison Company (“SCE”) respectfully submits its comments regarding the Commission’s proposed requirements for obtaining confidential treatment of market-sensitive data.

I.

**SCE’S GENERAL COMMENTS REGARDING
THE FILING OF MOTIONS FOR CONFIDENTIALITY**

SCE agrees with the Commission that parties must treat their confidentiality designations with care. Data that is clearly public should not be redacted; however, data that is “market sensitive” – regardless of whether it is addressed by the Matrix – must be protected. Many of the procedures proposed by the Commission are appropriate and necessary. SCE’s comments on the specific requirements proposed by the Commission in D.06-06-066 are found below in section II.

However, in addition to modifying the specific requirements in accordance with SCE’s suggested changes, SCE urges the Commission to adopt certain principles that will avoid redundant and burdensome filings by designating parties. For example, D. 06-06-066 requires

parties to file motions for confidentiality in order to file data under seal. SCE recognizes that it may be necessary to file a motion for confidentiality as to a category of data in a proceeding, but it is inefficient and burdensome for the Commission and designating parties to repeatedly file motions for confidentiality for every pleading that contains the same data. The Commission should make it clear that once a motion for confidentiality has been granted in a proceeding as to a certain category of data (e.g. forecast of capacity net short one year ahead), that category of data is protected for any future filings in the proceeding. SCE believes this is most likely the intent of the Commission in D.06-06-066; however, this should be made clear by a ruling in Phase II of this proceeding.

Furthermore, the Commission should be cautious of imposing consequences associated with the filing of motions for confidentiality for data that is not contained in the matrix. While the Commission has established clear divisions as to what it believes to be “market sensitive” information for data contained in the matrix, it has not done so for a variety of information not identified in the matrix. Thus, parties are not sure whether the Commission believes that certain non-Matrix data is “market sensitive” within the meaning of Pub. Util. Code Section 454.5(g). Therefore, in order to not chill the efforts of a party seeking confidential protection for information not contained in the matrix, the Commission should not introduce harsh consequences associated with the denial of a motion for confidential protection in such a circumstance.

II.

RESPONSE TO THE SPECIFIC FILING REQUIREMENTS **FOR CONFIDENTIALITY DESIGNATION PROPOSED IN D.06-06-066**

Ordering Paragraph 13 of D.06-06-066 requests comments concerning several proposed requirements for designating confidential materials. As a general matter, SCE believes that many of the requirements are appropriate and provide the following limited comments.

A. Penalties For Re-Filing Substantively The Same Motion For Confidential Protection Should Be Applied To All Entities, Not Just IOUs

The Commission’s second proposed requirement states: “A party whose motion has been denied for violation of item 1 that refiles the motion in substantively the same form may be subject to penalties pursuant to § 2107 at the discretion of the Assigned Commissioner, Assigned ALJ or Law and Motion ALJ.”¹ SCE does not object to this requirement, however, the Commission should adopt language that provides that the requirement is applicable to all parties that seek confidential protection from the Commission. Pub. Util. Code Section 2107 provides that “Any public utility which violates or fails to comply with any provision of the Constitution of this state or of this part, or which fails or neglects to comply with any part or provision of any order, decision, decree, rule, direction, demand, or requirement of the commission . . . is subject to a penalty[.]” The term “public utility” does not encompass all of the entities that may in the future seek confidentiality protection from the Commission. The Commission does have the authority, under Pub. Util. Code Section 2111 to penalize non-utility entities and individuals for violation of its orders. Therefore, the Commission should redraft this requirement in a manner that subjects any and all entities to penalties for the re-filing of a previously denied motion for confidential protection in substantively the same form.

B. Discussion Of Why The Data Should Be Kept Under Seal

SCE has no objections to the Commission’s proposed requirement under subsection 3.c. A discussion as to why data should be kept under seal is necessary in a confidentiality determination. However, SCE would suggest that subsection 3.c. indicate that such a discussion is unnecessary if the party is seeking confidentiality of data that is included in the matrix. Subsection 3.b. already captures the requirement that a designating party demonstrate that data is

¹ See D.06-06-066 at ¶13.

“covered by the IOU or ESP Matrix in R.05-06-040.”² The Commission has already determined that information designated in the matrix as confidential is market sensitive under section 454.5(g) and may be filed under seal. Accordingly, a requirement of a “discussion of why [] data should be kept under seal” for data already included in the matrix would be repetitive and unnecessary.

C. Identification of Appropriate Procedures Short of Submitting Entire Documents Under Seal

The requirement that parties seeking confidential protection for specific data identify procedures short of submitting entire documents under seal is burdensome and unnecessary. If documents are filed under seal, non-market participants will have access to the complete document. Market participants, on the other hand, will have access to redacted copies of the documents. In other words, market participants will have access to all of the data except for those portions which have already been specifically determined to be confidential on the Matrix or by motion.

Furthermore, since most of the categories in the Matrix afford the same level of protection to all data in a category regardless of the level of granularity (hourly, monthly, annually), demonstrating that specific data could be brought up to a different level of aggregation makes little sense. Additionally, aggregating data further (i.e., to system level) may mean that Commission staff and non-market participants may lose important (but market-sensitive) information necessary to do their analyses. Accordingly, the Commission should eliminate this requirement as unnecessary.

D. Assumption Of Confidential Protection After Filing Motion

The Commission’s fourth proposed requirement states:

² *Id.*

Parties may not assume that their motions have been granted if the Assigned Commissioner, Assigned ALJ or Law and Motion ALJ do not act on them. The onus shall be on parties to follow up with the Assigned Commissioner, ALJ or Law and Motion ALJ to seek a ruling, if one is not issued within 60 days of filing of the motion.³

Again, SCE does not have any objections to the above requirement. The Commission, however, should include language that indicates that during the time between the filing of a motion for confidential protection and the ALJ's ruling, the data that is the subject of the motion is deemed confidential until the ALJ makes a ruling otherwise.

III.

CONCLUSION

For the reasons discussed above, the Commission should adopt the suggested changes to the requirements for filing a motion for confidential protection in accordance with the recommendations described above.

³ *Id.*

Respectfully submitted,

FRANK J. COOLEY
BETH A. FOX
WILLIAM V. WALSH

/s/

By: William V. Walsh

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-4531
Facsimile: (626) 302-1935
E-mail: William.V.Walsh@SCE.com

August 4, 2006

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) PHASE II COMMENTS REGARDING CONFIDENTIALITY FILING REQUIREMENTS on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this 4th **day of August, 2006**, at Rosemead, California.

/s/

Cecilia Jones
Case Analyst
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770

R.05-06-040

Friday, August 4, 2006

CASE ADMINISTRATION
CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE, ROOM 370
ROSEMEAD, CA 91770
R.05-06-040

STACY AGUAYO
MANAGER OF REGUALTORY AFFAIRS
APS ENERGY SERVICES
400 E. VAN BUREN STREET, SUITE 750
PHOENIX, AZ 85004
R.05-06-040

MICHAEL ALCANTAR
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
1300 SW FIFTH AVENUE, SUITE 1750
PORTLAND, OR 97201
R.05-06-040

SCOTT J. ANDERS
RESEARCH/ADMINISTRATIVE CENTER
UNIVERSITY OF SAN DIEGO - LAW
5998 ALCALA PARK
SAN DIEGO, CA 92110
R.05-06-040

FRANK ANNUNZIATO
PRESIDENT
AMERICAN UTILITY NETWORK INC.
10705 DEER CANYON DR.
ALTA LOMA, CA 91737-2483
R.05-06-040

ROD AOKI
ATTORNEY AT LAW
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.05-06-040

Nilgun Atamturk
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.05-06-040

MICHAEL A. BACKSTROM
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.05-06-040

BARBARA R. BARKOVICH
BARKOVICH & YAP, INC.
44810 ROSEWOOD TERRACE
MENDOCINO, CA 95460
R.05-06-040

LARRY BARRETT
BARRETT CONSULTING SERVICES
AOL
PO BOX 60429
COLORADO SPRINGS, CO 80960
R.05-06-040

R. THOMAS BEACH
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 316
BERKELEY, CA 94710
R.05-06-040

C. SUSIE BERLIN
ATTORNEY AT LAW
MC CARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113
R.05-06-040

JOHN W. BOGY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120
R.05-06-040

WILLIAM H. BOOTH
ATTORNEY AT LAW
LAW OFFICE OF WILLIAM H. BOOTH
1500 NEWELL STREET, 5TH FLOOR
WALNUT CREEK, CA 94596
R.05-06-040

MICHAEL E. BOYD
PRESIDENT
CALIFORNIANS FOR RENEWABLE ENERGY,
INC.
5439 SOQUEL DRIVE
SOQUEL, CA 95073
R.05-06-040

ANDREW B. BROWN
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814
R.05-06-040

LYNNE BROWN
CALIFORNIANS FOR RENEWABLE ENERGY,
INC.
24 HARBOR ROAD
SAN FRANCISCO, CA 94124
R.05-06-040

NINA BUBNOVA
CASE MANAGER
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE B9A
SAN FRANCISCO, CA 94177
R.05-06-040

R.05-06-040

Friday, August 4, 2006

BETH ANN BURNS
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.05-06-040

CENTRAL FILES
CENTRAL FILES
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT
SAN DIEGO, CA 92123-1530-1530
R.05-06-040

BILL CHEN
CONSTELLATION NEWENERGY, INC.
2175 N. CALIFORNIA BLVD., SUITE 300
WALNUT CREEK, CA 94596
R.05-06-040

AVIS CLARK
CALPINE CORPORATION
4160 DUBLIN BLVD.
DUBLIN, CA 94568
R.05-06-040

FRANK J. COOLEY
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE RM 345
ROSEMEAD, CA 91770
R.05-06-040

BRIAN T. CRAGG
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE & DAY
LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.05-06-040

SEBASTIEN CSAPO
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000
SAN FRANCISCO, CA 94177
R.05-06-040

MICHAEL B. DAY
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE & DAY
LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
R.05-06-040

MARISA DECRISTOFORO
PACIFICORP
825 NE MULTNOMAH STREET, SUITE 800
PORTLAND, OR 97232
R.05-06-040

DANIEL W. DOUGLASS
ATTORNEY AT LAW
DOUGLASS & LIDDELL
21700 OXNARD STREET, SUITE 1030
WOODLAND HILLS, CA 91367-8102
R.05-06-040

JOHN DUTCHER
VICE PRESIDENT - REGULATORY AFFAIRS
MOUNTAIN UTILITIES
3210 CORTE VALENCIA
FAIRFIELD, CA 94533-7875
R.05-06-040

Michael M Edson
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5001
SAN FRANCISCO, CA 94102-3214
R.05-06-040

STEVE ENDO
PASADENA DEPARTMENT OF WATER &
POWER
45 EAST GLENARM STREET
PASADENA, CA 91105
R.05-06-040

VICKI FERGUSON
BRAUN & BLAISING, PC
915 L STREET, SUITE 1420
SACRAMENTO, CA 95814
R.05-06-040

BOB FINKELSTEIN
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVE., SUITE 350
SAN FRANCISCO, CA 94102
R.05-06-040

MICHEL PETER FLORIO
SENIOR ATTORNEY
THE UTILITY REFORM NETWORK (TURN)
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
R.05-06-040

ORLANDO B. FOOTE
HORTON, KNOX, CARTER & FOOTE
895 BROADWAY STREET
EL CENTRO, CA 92243-2341
R.05-06-040

STACIE FORD
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.05-06-040

R.05-06-040

Friday, August 4, 2006

BETH A. FOX
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770
R.05-06-040

JOHN C. GABRIELLI
GABRIELLI LAW OFFICE
430 D STREET
DAVIS, CA 95616
R.05-06-040

EDWARD B. GIESEKING
DIRECTOR/PRICING AND TARIFFS
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89150-0002
R.05-06-040

GINA GOMEZ
ATTORNEY AT LAW
VERIZON BUSINESS
201 SPEAR STREET, 9TH FLOOR
SAN FRANCISCO, CA 94105
R.05-06-040

JEFFREY P. GRAY
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE
ONE EMBARCADERO CENTER, SUITE 600
SAN FRANCISCO, CA 94111
R.05-06-040

STEVEN F. GREENWALD
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE, LLP
ONE EMBARCADERO CENTER, 6TH FLOOR
SAN FRANCISCO, CA 94111
R.05-06-040

YVONNE GROSS
REGULATORY POLICY MANAGER
SEMPRA ENERGY
101 ASH STREET, HQ08C
SAN DIEGO, CA 92101
R.05-06-040

ELSTON K. GRUBAUGH
IMPERIAL IRRIGATION DISTRICT
333 EAST BARIONI BLVD.
IMPERIAL, CA 92251
R.05-06-040

GARY HINNERS
RELIANT ENERGY, INC.
PO BOX 148
HOUSTON, TX 77001-0148
R.05-06-040

CARYN HOLMES
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET
ENERGY DIVISION
SACRAMENTO, CA 95814
R.05-06-040

MICHAEL JASKE
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-22
SACRAMENTO, CA 95814
R.05-06-040

BRUNO JEIDER
BURBANK WATER AND POWER
164 WEST MAGNOLIA BOULEVARD
BURBANK, CA 91502
R.05-06-040

BRIDGET A. JENSEN
ATTORNEY AT LAW
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89150
R.05-06-040

EVELYN KAHL
ATTORNEY AT LAW
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO, CA 94104
R.05-06-040

CAROLYN KEHREIN
ENERGY MANAGEMENT SERVICES
1505 DUNLAP COURT
DIXON, CA 95620-4208
R.05-06-040

WENDY KEILANI
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT, CP32D
SAN DIEGO, CA 92123
R.05-06-040

STEVEN KELLY
INDEPENDENT ENERGY PRODUCERS ASSN
1215 K STREET, SUITE 900
SACRAMENTO, CA 95814-3947
R.05-06-040

DOUGLAS K. KERNER
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95814
R.05-06-040

R.05-06-040

Friday, August 4, 2006

CHRIS KING
CALIFORNIA CONSUMER EMPOWERMENT
ALLIANCE
ONE TWIN DOLPHIN DRIVE
REDWOOD CITY, CA 94065
R.05-06-040

GREGORY S.G. KLATT
DOUGLASS & LIDDELL
Alliance for Retail Energy Markets
21700 OXNARD STREET, SUITE 1030
WOODLAND, CA 91367-8102
R.05-06-040

EDWARD V. KURZ
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B30A
SAN FRANCISCO, CA 94105
R.05-06-040

STEPHANIE LA SHAWN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B8R
SAN FRANCISCO, CA 94105
R.05-06-040

YAREK LEHR
DEPARTMENT OF WATER
730 CORPORATION YARD WAY
CITY OF CORONA DEPARTMENT OF WATER
& POW
CORONA, CA 92880
R.05-06-040

CONSTANCE LENI
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814
R.05-06-040

JOHN W. LESLIE
ATTORNEY AT LAW
LUCE, FORWARD, HAMILTON & SCRIPPS,
LLP
11988 EL CAMINO REAL, SUITE 200
SAN DIEGO, CA 92130
R.05-06-040

DONALD C. LIDDELL
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO, CA 92103
R.05-06-040

KAREN LINDH
LINDH & ASSOCIATES
7909 WALERGA ROAD, NO. 112, PMB119
CMTA
ANTELOPE, CA 95843
R.05-06-040

STEVEN G. LINS
CITY OF GLENDALE
613 EAST BROADWAY, SUITE 220
GLENDALE, CA 91206-4394
R.05-06-040

GRACE LIVINGSTON-NUNLEY
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000 MAIL CODE B9A
SAN FRANCISCO, CA 94177
R.05-06-040

Scott Logan
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
OFFICE OF RATEPAYER ADVOCATES
ROOM 4209
SAN FRANCISCO, CA 94102-3214
R.05-06-040

CARL C. LOWER
THE POLARIS GROUP
717 LAW STREET
SAN DIEGO, CA 92109-4236-2436
R.05-06-040

ED LUCHA
PROJECT COORDINATOR
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000, MAIL CODE: B9A
PO BOX 770000
SAN FRANCISCO, CA 94177
R.05-06-040

MARTIN A. MATTES
ATTORNEY AT LAW
NOSSAMAN GUTHNER KNOX & ELLIOTT,
LLP
50 CALIFORNIA STREET, 34TH FLOOR
Jack in the Box, Inc
SAN FRANCISCO, CA 94111-4799
R.05-06-040

CHRISTOPHER J. MAYER
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354
R.05-06-040

MICHAEL MAZUR
3 PHASES ELECTRICAL CONSULTING
2100 SEPULVEDA BLVD., SUITE 37
MANHATTAN BEACH, CA 90266
R.05-06-040

BARRY F MCCARTHY
ATTORNEY AT LAW
MCCARTHY & BERLIN, LLP
100 PARK CENTER PLAZA, SUITE 501
SAN JOSE, CA 95113
R.05-06-040

R.05-06-040

Friday, August 4, 2006

KEITH R. MCCREA
ATTORNEY AT LAW
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE, NW
California Manufacturers & Technology
Association
WASHINGTON, DC 20004-2415
R.05-06-040

BRUCE MCCLAUGHLIN
BRAUN & BLAISING, P.C.
California Municipal Utilities Association
8066 GARRYANNA DRIVE
CITRUS HEIGHTS, CA 95610
R.05-06-040

ELENA MELLO
SIERRA PACIFIC POWER COMPANY
6100 NEIL RD.
RENO, NV 89511
R.05-06-040

MARCIE MILNER
CORAL POWER, L.L.C.
4445 EASTGATE MALL, SUITE 100
SAN DIEGO, CA 92121
R.05-06-040

SCOTT MOLLOY
BUILDING INDUSTRY ASSO.OF SAN DIEGO
CNTY
9201 SPECTRUM CENTER BLVD., SUITE 110
SAN DIEGO, CA 92123-1407
R.05-06-040

RONALD MOORE
GOLDEN STATE WATER/BEAR VALLEY
ELECTRIC
630 EAST FOOTHILL BLVD.
SAN DIMAS, CA 91773
R.05-06-040

GREGG MORRIS
GREEN POWER INSTITUTE
2039 SHATTUCK AVE., SUITE 402
BERKELEY, CA 94704
R.05-06-040

RICK NOGER
PRAXAIR PLAINFIELD, INC.
2711 CENTERVILLE ROAD, SUITE 400
WILMINGTON, DE 19808
R.05-06-040

NOEL OBIORA
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 4107
SAN FRANCISCO, CA 94102-3214
R.05-06-040

VALERIE J. ONTIVEROZ
ANALYST/STATE REGULATORY AFFAIRS
SOUTHWEST GAS CORPORATION
5241 SPRING MOUNTAIN ROAD
LAS VEGAS, NV 89150-0002
R.05-06-040

MARJORIE OXSEN
CALPINE CORPORATION
3875 HOPYARD RD. SUITE 345
PLEASANTON, CA 94588
R.05-06-040

Karen P Paull
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5027
SAN FRANCISCO, CA 94102-3214
R.05-06-040

NORMAN A. PEDERSEN
ATTORNEY AT LAW
HANNA AND MORTON LLP
444 FLOWER STREET, SUITE 2050
LOS ANGELES, CA 90071
R.05-06-040

ROGER PELOTE
WILLIAMS POWER COMPANY, INC.
12736 CALIFA STREET
VALLEY VILLAGE, CA 91607
R.05-06-040

ROBERT L. PETTINATO
LOS ANGELES DEPARTMENT OF WATER &
POWER
111 NORTH HOPE STREET, ROOM 1151
LOS ANGELES, CA 90012-0100
R.05-06-040

JENNIFER K. POST
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO, CA 94105
R.05-06-040

ADRIAN PYE
ENERGY AMERICA, LLC
263 TRESSER BLVD.
STAMFORD, CT 6901
R.05-06-040

LARRY RACKLEY
SIERRA PACIFIC POWER CO.
PO BOX 10100
RENO, NV 89520
R.05-06-040

R.05-06-040

Friday, August 4, 2006

PATRICK ROSVALL
ATTORNEY AT LAW
COOPER, WHITE & COOPER ,L.L.P.
201 CALIFORNIA ST., 17TH FLOOR
Small LEC's
SAN FRANCISCO, CA 94111
R.05-06-040

KATHERINE RYZHAYA
PACIFIC GAS & ELECTRIC COMPANY
PO BOX 770000
SAN FRANCISCO, CA 94177
R.05-06-040

ROBERT SARVEY
TREASURER CARE
CALIFORNIANS FOR RENEWABLE ENERGY,
INC.
501 W. GRANTLINE RD
TRACY, CA 95376
R.05-06-040

J.A. SAVAGE
CALIFORNIA ENERGY MARKETS
517B POTRERO AVE
SAN FRANCISCO, CA 94110-1431
R.05-06-040

STEVEN S. SCHLEIMER
DIR. OF MARKET & REGULATORY AFFAIRS
CALPINE CORPORATION
3875 HOPYARD ROAD, SUITE 345
PO BOX 11749
PLEASANTON, CA 94588-1749
R.05-06-040

REED V. SCHMIDT
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
California City-County Street Light Assoc.
BERKELEY, CA 94703-2714
R.05-06-040

DONALD W. SCHOENBECK
RCS, INC.
900 WASHINGTON STREET, SUITE 780
VANCOUVER, WA 98660
R.05-06-040

MARK P. SCHREIBER
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111
R.05-06-040

LINDA Y. SHERIF
ATTORNEY AT LAW
CALPINE CORPORATION
3875 HOPYARD RD. SUITE 345
PLEASANTON, CA 94588
R.05-06-040

MERIDETH TIRPAK STERKEL
CALIFORNIA PUBLIC UTILITIES
COMMISSION
505 VAN NESS AVENUE
AREA 4-A
SAN FRANCISCO, CA 94102-3214
R.05-06-040

KAREN TERRANOVA
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, STE 2200
SAN FRANCISCO, CA 94104
R.05-06-040

Sarah R Thomas
CALIF PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
ROOM 5105
SAN FRANCISCO, CA 94102-3214
R.05-06-040

VICKI L. THOMPSON
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET HQ13
SAN DIEGO, CA 92101
R.05-06-040

WILLIAM V. WALSH
ATTORNEY AT LAW
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE. 3RD FLOOR
ROSEMEAD, CA 91770
R.05-06-040

JOY WARREN
MODESTO IRRIGATION DISTRICT
1231 11TH STREET
MODESTO, CA 95354
R.05-06-040

LISA WEINZIMER
CALIFORNIA ENERGY REPORTER
PLATTS
695 NINTH AVENUE, NO. 2
SAN FRANCISCO, CA 94118
R.05-06-040

ANDREA WELLER
ATTORNEY AT LAW
STRATEGIC ENERGY, LTD
7220 AVENIDA ENCINAS, SUITE 120
CARLSBAD, CA 92209
R.05-06-040

VALERIE J. WINN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, B9A
SAN FRANCISCO, CA 94105
R.05-06-040

R.05-06-040

Friday, August 4, 2006

MARIA L. WOODBRIDGE
ATTORNEY AT LAW
MCI, INC.
201 SPEAR STREET, 9TH FLOOR
SAN FRANCISCO, CA 94105
R.05-06-040

KEVIN WOODRUFF
WOODRUFF EXPERT SERVICES
1100 K STREET, SUITE 204
SACRAMENTO, CA 95814
R.05-06-040

CALPINE POWERAMERICA-CA, LLC
717 TEXAS AVENUE
HOUSTON, TX 77002
R.05-06-040

LEGAL & REGULATORY DEPARTMENT
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
R.05-06-040

MRW & ASSOCIATES, INC.
1999 HARRISON STREET, STE 1440
OAKLAND, CA 94612-3517
R.05-06-040

ATTORNEY
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO, CA 95354
R.05-06-040

BP ENERGY COMPANY
501 WESTLAKE PARK BLVD
HOUSTON, TX 77079
R.05-06-040

QUIET ENERGY
3311 VAN ALLEN PL.
TOPANGA, CA 90290
R.05-06-040

ELECTRIC AMERICA
600 ANTON BLVD STE 2000
COSTA MESA, CA 92626
R.05-06-040

PILOT POWER GROUP, INC.
9320 CHESAPEAKE DRIVE, SUITE 112
SAN DIEGO, CA 92123
R.05-06-040

CALIFORNIA ENERGY MARKETS
517 B POTRERO AVENUE
SAN FRANCISCO, CA 94110
R.05-06-040